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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12  
13 v.  
14 MICHAEL GERALD HAMMOND,  
15 Defendant.

Case No. 2:18-cr-00059-KJD-DJA

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
(Second Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
17 United States Attorney, and Justin Washburne, Assistant United States Attorney, counsel for  
18 the United States of America, and Rene L. Valladares, Federal Public Defender, and Katherine  
19 A. Tanaka, Assistant Federal Public Defender, counsel for Michael Gerald Hammond, that the  
20 Preliminary Hearing currently scheduled on July 5, 2023, be vacated and continued to a date  
21 and time convenient to the Court, but no sooner than thirty (30) days.

22 This Stipulation is entered into for the following reasons:

23 1. Government counsel is in the process of obtaining further discovery. Defense  
24 counsel needs additional time to review discovery with Mr. Hammond once it is received.  
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1           2.       The parties need additional time to discuss the violations and any potential  
2 resolutions. Undersigned counsel needs additional time to discuss Mr. Hammond's options  
3 with him so that he can decide whether to waive or go forward with the preliminary hearing.

4           3.       Defendant is incarcerated and does not object to a continuance.

5           4.       Additionally, denial of this request for continuance could result in a  
6 miscarriage of justice.

7           This is the second request for continuance filed herein.

8           DATED this 29th day of June, 2023.

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10          RENE L. VALLADARES  
11          Federal Public Defender

            JASON M. FRIERSON  
            United States Attorney

12          By /s/ Katherine A. Tanaka  
13          KATHERINE A. TANAKA  
14          Assistant Federal Public Defender

            By /s/ Justin Washburne  
            JUSTIN WASHBURNE  
            Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
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5 v.

6 MICHAEL GERALD HAMMOND,  
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8

Case No. 2:18-cr-00059-KJD-DJA

**ORDER**

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10 Based on the Stipulation of counsel and good cause appearing,  
11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on July 5,  
12 2023 at the hour of 3:30 p.m., be vacated and continued to August 7, 2023 at the hour of 1:00  
13 p.m. in Courtroom 3B.

14 DATED this 30th day of June, 2023.

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17 UNITED STATES MAGISTRATE JUDGE  
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